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 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES DISTRICT COURT

for the

Northern District of Mississippi

Greenville Division

Jeremy G. Miller

Case No. 4:22-CV-018-DMB-JMV

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Pioneer Hi-Bred International Inc.

Jury Trial: *(check one)* Yes No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jeremy Miller
Street Address	17 17th Street
City and County	Clarksdale, Coahoma
State and Zip Code	Mississippi 38614
Telephone Number	6623515424
E-mail Address	jmiller_38614@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Pioneer Hi-Bred International Inc.
Job or Title (<i>if known</i>)	
Street Address	2300 Pioneer Drive
City and County	Plymouth, Marshall
State and Zip Code	Indiana 46563
Telephone Number	5749363243
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Jeremy G. Miller, is a citizen of the

State of (name) Mississippi.

2. If the plaintiff is a corporation

The plaintiff, (name), is incorporated

under the laws of the State of (name),

and has its principal place of business in the State of (name)

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name), is a citizen of

the State of (name). Or is a citizen of

(foreign nation).

2. If the defendant is a corporation

The defendant, (name) Pioneer Hi-Bred International Inc., is incorporated under

the laws of the State of (name) Indiana,

principal place of business in the State of (name) Indiana,

Or is incorporated under the laws of (foreign nation),

and has its principal place of business in (name).

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

Plaintiff suffered emotional distress, pain and suffering, infertility, disfigurement, shortened life expectancy, and long-term medical care.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 04/11/2011, at (place) Pioneer Hi-Bred International Inc.,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because (*describe the acts or failures to act and why they were negligent*)

1. Negligence-they failed to give needed personal protection equipment(ppe) to protect from products that are known to be carcinogenic(Roundup). 2. Negligence- Hazardous work environment working in confined spaces with no breathing apparatus and working with equipment and product that have been highly saturated with roundup. 3. Product liability Negligence knowing the the product being manufactured is harmful to humans and failing to keep workers safe.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by (*explain*)
Being introduced to the dangers in the workplace associated with roundup use and working around products genetically modified with roundup caused plaintiff to develop cancer.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks \$150,000,000 in punitive damages and \$100,000,000 in compensatory damages. The lack of concern for my safety when working with products that are carcinogenic is a direct violation of this company knowingly or unknowingly surrounding the dangers that roundup causes.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

2/2/22

Signature of Plaintiff

Jeremy Miller

Printed Name of Plaintiff

Jeremy Miller

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
